

**JUDGE BAER**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

LORENZO RODRIGUEZ, :  
a/k/a "Flaco," :  
JOSE CIRRASQUILLO, :  
a/k/a "Tio," :  
DEMI ABRIHAM, :  
a/k/a "300," :  
BRYANT DE LOS SANTOS, :

Defendants. :

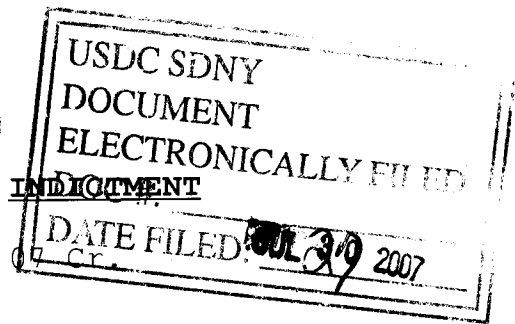
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COUNT ONE

The Grand Jury charges:

1. From in or about June 7, 2007, up to and including June 27, 2007, in the Southern District of New York and elsewhere, LORENZO RODRIGUEZ, a/k/a "Flaco," JOSE CIRRASQUILLO, a/k/a "Tio," DEMI ABRAHAM, a/k/a "300," and BRYANT DE LOS SANTOS, the defendants, and others known and unknown, unlawfully, willfully, and knowingly conspired to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), to wit, the defendants, and others known and unknown, conspired to rob a cocaine dealer of approximately 25 kilograms of cocaine in the Bronx, and would thereby have obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

(Title 18, United States Code, Sections 1951 and 2.)



**07 CRIM 699**

COUNT TWO

The Grand Jury further charges:

2. From in or about June 7, 2007, up to and including June 27, 2007, in the Southern District of New York and elsewhere, LORENZO RODRIGUEZ, a/k/a "Flaco," JOSE CIRRASQUILLO, a/k/a "Tio," DEMI ABRAHAM, a/k/a "300," and BRYANT DE LOS SANTOS, the defendants, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

3. It was a part and an object of said conspiracy that LORENZO RODRIGUEZ, a/k/a "Flaco," JOSE CIRRASQUILLO, a/k/a "Tio," DEMI ABRAHAM, a/k/a "300," and BRYANT DE LOS SANTOS, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Sections 812, 841(a)(1), and 841(b)(1)(A) of Title 21, United States Code.

Overt Acts

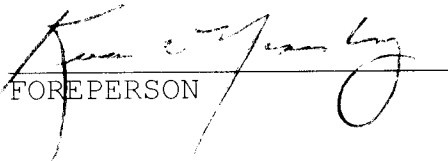
4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

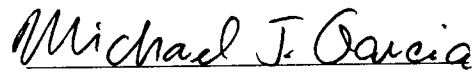
a. On or about June 26, 2007, in Queens, New York, LORENZO RODRIGUEZ, a/k/a "Flaco," JOSE CIRRASQUILLO, a/k/a

"Tio," the defendants, met at a hotel and discussed a plan to rob individuals they believed to be in possession of approximately 25 to 30 kilograms of cocaine.

b. On or about June 27, 2007, in Bronx, New York, LORENZO RODRIGUEZ, a/k/a "Flaco," JOSE CIRRASQUILLO, a/k/a "Tio," DEMI ABRAHAM, a/k/a "300," and BRYANT DE LOS SANTOS, the defendants, traveled to the vicinity of a storage facility in Bronx, New York, to meet with other individuals to go and rob individuals they believed to be in possession of approximately 25 to 30 kilograms of cocaine.

(Title 21, United States Code, Section 846.)

  
FOREPERSON

  
MICHAEL J. GARCIA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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BRYANT DE LOS SANTOS,

Defendants.

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INDICTMENT

07 Cr.

(18 U.S.C. §§ 2, 1951,  
21 U.S.C. § 846.)

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MICHAEL J. GARCIA  
United States Attorney.

A TRUE BILL

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*Kenneth J. [Signature]*  
Foreperson

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7/27/07 Ad Int Ref 11-1-07 This case  
A Aug 1 to Judge Doe for all purpose

*Mr Judge Doe*